

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRENDAN McGUINNESS,

CIVIL ACTION NO. 05-11738-EFH

Plaintiff,

v.

JAMES R. BENDER,
LOIS RUSSO,
MICHAEL D. FARLEY,
JASON J. OLIVER,
DAVID M. SHAW,
JUAN MEZA,
JOHN A. BELAIR, and
JOHN A. FLOWERS,

Defendants.

MOTION TO ENLARGE

The defendants, by counsel, move that the time for responding to the plaintiff's motion for partial summary judgment be enlarged up to and including **April 10, 2006**. As reason therefore, the defendants state that counsel requires additional time to research and respond to the factual and legal claims presented by this motion. The additional time is also required because of counsel's other litigation responsibilities, and because of the increasing number of cases assigned to this office.

Dated: March 21, 2006

Respectfully submitted,

NANCY ANKERS WHITE
Special Asst. Attorney General

/s/ William D. Saltzman
William D. Saltzman, BBO No. 439749
Department of Correction Legal Division
70 Franklin Street, Suite 600
Boston, Massachusetts 02110
(617) 727-3300, Ext. 154
wdsaltzman@doc.state.ma.us

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on March 21, 2006.

Dated: March 21, 2006

/s/ William D. Saltzman
William D. Saltzman